D ARTMENT OF TRANSPORTATI
UNITED STATES COAST GUARD

Captain of the Port
Marine Safety Office
477 Michigan Ave RM 550
Detroit, Michigan 48226

7302
5 November 1980

EPA Region V
536 S. Clark Street
Chicago, IL 60605

Attn: Richard Bartell

Subj: Federal Marine Terminal, Hazardous Material Dump Site, Riverview, MI, on the Detroit River; information concerning

Gentlemen:

The consensus of opinion given me at the meeting of the RRT on 21 August 1980 was that mitigatory containment efforts would be required at the Riverview site. The type of action to be taken was to be based upon the results of analysis of samples we had taken just prior to the meeting. Our test results confirmed the presence and transfer of various primary pollutants from the site into the waters of the Detroit River, both from surface runoff as well as from subsurface leaching from the shoreline of the site. Neither of the two types of discharge can be shown to be in reportable quantities in accordance with the FWPCA. Many of the pollutants present on the site exceed water quality standards and all are hazardous to human health. The introduction of many of these harmful substances into the Detroit River continues, but due to the large volumn of water flowing in the Detroit River, the concentrations are unmeasurable once they enter the water column. The level of contamination from surface runoff or leachate can only be measured before it enters the watercolumn. While the number of hazardous pollutants located on the site is alarming the evidence to date indicates that they are entering the water column in minute quantities over an extended period of time. The problem at this site is a long term chronic hazard to health. It could become an immediate substantial threat rather than a potential threat to health if the site were carelessly disturbed.

Mitigating action such as encapsulating the site will not remove the potential hazard but only deter the movement of pollutants for a period of time. Such action is substantially that which was offered to the Corps of Engineers by FMT on 28 Feb 1980 as a temporary measure. The only clear cut solution at this site is removal of the contaminants. Removal presents the problem of increasing the level of contaminant being introduced into the Detroit River due to the disturbance of the river bank during the removal process. Tests show that the site is contaminated at the waters edge, therefore the site would have to be cofferdamed to hold the river water out while the existing riverbank was removed together with the contaminants present in the soil. This process would be exceptionally costly. Estimates presented to the Corps of Engineers in 1979 ran as high as 7 to 8 million dollars. They would no doubt be higher today.

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We have evaluated the results of tests presented to the government by Federal Marine Terminals, those conducted by the State of Michigan and our own tests. These tests confirm that designated hazardous substances are being introduced into the navigable waters of the United States, The tests also confirm that many hazardous substances are contained in samples of sediments and liquids taken on the site at levels which exceed recommended safe levels listed in the federal water quality standard. This constitutes a chronic hazard to health from leaching and runoff which has occurred for several years. So far, we have been unable to show a violation of the FWPCA. Mitigatory or cleanup action funding may not be recoverable under the FWPCA . The EPA is currently pursuing court action under section 7003 of the Resource Conservation Recovery Act to require cleanup by the responsible party. There are no immediately visible effects from the introduction of the hazardous chemicals from this site under the present conditions. Any action taken will either mitigate the health hazard or completly remove it. The effect of mitigation will be uncertain at best. The health hazard appears to one of long term pollution, occurring so slowly, that the use of 311 funding does not appear appropriate. It appears that the EPA course of action in the courts to require the removal of the hazard by the responsible party is the proper one.

I solicit your comments and recommendations concerning the future action to be taken to remove or mitigate the potential future hazard to the environment. What is the value of proceeding with the uncertain mitigatory action of trying to seal the site to prevent the movement of hazardous substances? If mitigatory action is appropriate, would the acceptance of the action proposed by FMT on 28 FEB 1980, as a permanent solution, accomplish the intended mitigation if the facility were completed together with the sealing of the entire surface? Should total removal of all contaminants be accomplished? Identify the specific funding to accomplish your recommendation? Note that mitigatory or removal action undertaken before the EPA is able to accomplish additional on site testing may adversly affect their court action.

Your timely response will be appreciated.

Sincerely,

K. P. WASSENBERG
Commander, U. S. Coast Guard
Captain of the Port
Detroit, Michigan

STATE OF MICHIGAN

JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

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RUSSELL J. HARDING, Director

REPLY TO:

SURFACE WATER QUALITY DIVISION
KNAPPS CENTRE
PO BOX 30273
LANSING MI 48909-7773

June 4, 2001

Mr. Dave Dempsey
Michigan Environmental Council
119 Pere Marquette, Suite 2A
Lansing, Michigan 48912

Dear Mr. Dempsey:

Thank you for your May 21, 2001 letter regarding the water and sediment quality of the Detroit River. We share these same concerns and are currently focusing cleanup efforts on contaminated sediments at the BASF/Riverview location. We have requested a $4 million appropriation in the Clean Michigan Initiative funds to remove this contamination and expect to initiate our sediment cleanup in early 2002.

Currently, Detroit River sediment data on dioxin by Michigan State University researchers (Kamman, 2001) shows dioxin widespread in upper Detroit River sediments from Belle Isle downstream. These amounts represent very low concentrations (parts per trillion). Similar low levels of dioxin were detected in sediments from 13 stations along the Detroit River in a 1994 report by the Ontario Ministry of Environment and Energy.

The primary risk to humans from dioxins, however, is not from contact at the nearby boat site or ingestion of river water, but rather through eating contaminated fish. Fish tissue samples were collected in 1995 from a number of areas in the Detroit River, as well as Monguagon Creek and Lake Erie. A variety of fish species, including bullheads, largemouth bass, muskie, pumpkinseed, pike, rockbass, walleye, and yellow perch were sampled. None of these fish samples exceeded the Department of Community Health "trigger level" (a toxicity equivalency threshold concentration for fish tissue dioxins of greater than 10 parts per trillion (ppt)). Carp collected at Grassy Island in 1994, showed four of ten fish sampled exceeded this 10 ppt level. As a result, there is a fish advisory for carp from the Detroit River. Even these concentrations are lower than those levels reported for Great Lakes trout and whitefish.

The strategy we are using on the Detroit River is to prioritize our sediment remediation efforts on those areas most contaminated. The most contaminated area is the BASF/Riverview site, where the main sediment contaminant is mercury. Mercury is present at high concentrations in the sediments from the historical releases and activities of the manufacturing facilities that operated there and upstream. This area holds the largest known mass of mercury impacting the fish in the Detroit River. The distribution of other contaminants like dioxins in the Detroit River suggests the presence of multiple historic sources of low level contamination.

Our cleanup efforts will focus on the large residual mercury contamination and other contaminants like dioxins will also be removed. We are scheduled to take sediment samples to confirm a successful cleanup and will continue to monitor Detroit River fish as part of our Fish Contaminant Monitoring Program.

If you have additional questions or concerns, please contact Mr. Mark Oemke, Great Lakes and Environmental Assessment Section, at 517-335-4206, or you may contact me.

Sincerely,

David A. Hamilton, Chief
Surface Water Quality Division
517-335-4176

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cc: Ms. Bettie Williamson
Ms. Tracey Kroll
Ms. Loretta Helstowski
Ms. Jean Jackson
Mr. Mark Oemke, Department of Environmental Quality